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12 *Attorneys for Defendants*

13 **UNITED STATES DISTRICT COURT**

14 **EASTERN DISTRICT OF CALIFORNIA**

15 MARTIN J. WALSH, Secretary of Labor,
16 United States Department of Labor,

17 Plaintiff,

18 v.

19 SL ONE GLOBAL, INC., dba VIVA
20 SUPERMARKET, a California corporation; SMF
21 GLOBAL, INC. dba VIVA SUPERMARKET, a
22 California corporation, NARI TRADING, INC., dba
23 VIVA SUPERMARKET; UNI FOODS, INC., dba
24 VIVA SUPERMARKET, a California corporation;
SEAN LOLOEE, an individual, and as owner and
managing agent of the Corporate Defendants; and
KARLA MONTOYA, an individual, and managing
agent of the Corporate Defendants.

25 Defendants.
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No. 2:22-cv-0583 WSB DB

**STIPULATION AND ORDER TO
MODIFY SCHEDULING ORDER**

1 COMES NOW Plaintiff, MARTIN J. WALSH, Secretary of Labor, U.S. Department of
2 Labor and Defendants, SL ONE GLOBAL, INC., SMF GLOBAL, INC., NARI TRADING, INC.
3 UNI FOODS, INC., SEAN LOLOEE, and KARLA MONTOYA (“the Parties”), by and through
4 their respective attorneys of record, hereby submit the following stipulation and proposed order to
5 modify the Scheduling Order and extend the deadline for Plaintiff to file an amended Exhibit A to
6 the operative Complaint.

7 1. WHEREAS, on September 21, 2022, the Court issued a Pretrial Scheduling Order
8 setting the deadline to amend Exhibit A to 90 days after issuance of the Scheduling Order, on
9 December 20, 2022. [Dkt. No. 23]. Exhibit A to the Complaint is a list of Defendants’ employees
10 whom the Secretary contends are owed back wages from Defendants. The Secretary contends that
11 he needs to review Defendants’ responses to discovery requests, which include employee lists and
12 pay records, in order to discover additional employees owed back wages who should be added to
13 Exhibit A to the operative Complaint.

14 2. WHEREAS, the Secretary provided Defendants an extension to respond to the
15 Secretary’s First Set of Interrogatories to Sean Lolee, and First Set of Requests for Production to
16 corporate defendants from December 5, 2022 to January 13, 2023.

17 3. WHEREAS, Defendants in turn agreed to extend the December 20, 2022 deadline for
18 Plaintiff to amend Exhibit A to February 22, 2023.

19 4. WHEREAS, the Secretary believes and anticipates that the proposed extension will not
20 interfere with the other deadlines set by this Court.


21 NOW, THEREFORE, the Parties hereby stipulate that the deadline to amend Exhibit A to
22 the operative Complaint shall be extended from December 20, 2022 to February 22, 2023.

1 Dated: December 16, 2022

Respectfully submitted,

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9 By: 
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13 By: 
14 CASSANDRA M. FERRANNINI
15 SANDRA L. SAVA
16 DOWNEY BRAND LLP
17 *Attorneys for Defendants*
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ORDER

Pursuant to the parties' above stipulation and for good cause shown, IT IS SO ORDERED, that the deadline indicated in the Scheduling Order [ECF No. 23] to amend Exhibit A to the operative Complaint is extended from December 20, 2022 to February 23, 2023.

DATED: December 16, 2022

/s/ DEBORAH BARNES

UNITED STATES MAGISTRATE JUDGE